

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: February 1, 2013

ANALYST: Laura E. Sinram

- I. COMMITTEE: California Real Estate Political Action Committee/Federal (C00083279)
M. Iqbal Bholat, Treasurer
525 S. Virgil Ave.
Los Angeles, CA 90020
- II. RELEVANT STATUTE: 2 U.S.C. § 434(b)(2)
11 CFR § 104.3(a)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

California Real Estate Political Action Committee/Federal ("the Committee") amended its 2011 Mid-Year Report to disclose additional receipts of \$363,223.69, which were not disclosed on the original report (Attachment 2).

On July 31, 2011, the Committee filed the original 2011 Mid-Year Report covering the period from January 1, 2011 through June 30, 2011. The report disclosed \$153,222.26 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and \$270,750.53 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page (Image 11931531557).

On January 31, 2012, the Committee filed an Amended 2011 Mid-Year Report. The report disclosed \$174,335.33 in receipts on Line 11(a)(i) and \$612,861.15 in receipts on Line 11(a)(ii) of the Detailed Summary Page, an increase of \$363,223.69 from the original report (Image 12950395861; Attachment 2).

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On March 26, 2012, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2011 Mid-Year Report, received January 31, 2012. The RAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2011 Mid-Year Report that were not disclosed in the original filing (Image 12330004420).

On April 27, 2012, the Committee filed a Miscellaneous Electronic Submission ("Form 99") which stated, in part:

"In 2011, CREPAC/Federal started using a fundraising database managed by the National Association of Realtors (NAR) and encountered problems during the transition to the new software program. Some online contributions were not posted by NAR until several months after the original report was filed. In addition, other contributions were incorrectly allocated in the database due to a programming error in splitting the contributions. After NAR fixed the formula, there was a substantial increase in contributions allocated to CREPAC/Federal, which was reflected in the amended report (Image 12951583374)."

On November 16, 2012, the Reports Analysis Division (RAD) Analyst left voicemail messages for the Committee's treasurer, M. Iqbal Bholat, and assistant treasurer, Cary Davidson, informing them that the increase in receipts disclosed on the amended 2011 Mid-Year Report were referable for further action by the Commission. The Analyst noted the explanation provided as a Form 99 and explained that if the Committee wanted to provide further clarification about the issue, they could submit additional information for the public record. The Analyst left contact information if the Committee had questions (Attachment 3).

On November 29, Flora Yin, an attorney for the Committee, called the Analyst in reference to the referable matter. The Analyst noted the explanation provided as a Form 99 and stated that if the Committee wanted to provide further clarification about the issue, they could submit additional information for the public record (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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O-Index (2013-2014)													
Cmte. ID: C00083279 Cmte. Name: CALIFORNIA REAL ESTATE POLITICAL ACTION COMMITTEE/FEDERAL													
Treasurer Name: BHOLAT, M. IQBAL Address: 525 S. VIRGIL AVE., LOS ANGELES, CA 90020													
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: QUARTERLY FILER													
Form Tpl	Rpt Tp	AI	Recpt Dt	Pgs	Begin Inq#	Reg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans
No records were found for this cycle.													

O-Index (2011-2012)													
Cmte. ID: C00083279 Cmte. Name: CALIFORNIA REAL ESTATE POLITICAL ACTION COMMITTEE/FEDERAL													
Treasurer Name: BHOLAT, M. IQBAL Address: 525 S. VIRGIL AVE., LOS ANGELES, CA 90020													
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: QUARTERLY FILER													
Form Tpl	Rpt Tp	AI	Recpt Dt	Pgs	Begin Inq#	Reg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans
MS-T			4/27/2012	1	12951583374								
RQ2	MY	A	3/28/2012	2	12330004420	1/1/2011	6/30/2011	3/26/2012	\$663,482	\$424,784	\$741,201	\$347,065	\$0
F3XN	MY	N	7/31/2011	259	11831531555	1/1/2011	6/30/2011		\$663,482	\$788,007	\$741,201	\$710,288	\$0
F3XA	MY	A	1/31/2012	339	12950395859	1/1/2011	6/30/2011		\$710,288	\$160,060	\$7,536	\$862,813	\$0
F3XN	YE	N	1/31/2012	247	12970340091	1/1/2011	12/31/2011		\$862,813	\$298,591	\$711,035	\$450,369	\$0
F3XN	Q1	N	4/1/2012	147	12970832727	1/1/2012	3/31/2012		\$862,813	\$298,591	\$711,288	\$450,116	\$0
F3XA	Q1	A	7/15/2012	148	12952473448	1/1/2012	3/31/2012		\$862,813	\$298,591	\$711,288	\$450,116	\$0
F3XA	Q1	A	1/28/2013	148	13960504892	1/1/2012	3/31/2012		\$450,116	\$88,869	\$3,611	\$535,373	\$0
F3XN	Q2	N	7/15/2012	104	12971454683	4/1/2012	6/30/2012		\$535,373	\$33,502	\$791	\$568,084	\$0
F3XN	Q3	N	10/15/2012	110	12954425252	7/1/2012	9/30/2012		\$568,084	\$23,113	\$747	\$590,451	\$0
F3XN	30G	N	12/6/2012	73	12940898553	10/1/2012	11/26/2012		\$590,451	\$12,831		\$603,282	\$0
F3XN	YE	N	1/28/2013	38	13960505048	11/27/2012	12/31/2012						
Totals									\$1,404,976		\$1,465,170		

O-Index (2009-2010)													
Cmte. ID: C00083279 Cmte. Name: CALIFORNIA REAL ESTATE POLITICAL ACTION COMMITTEE/FEDERAL													
Treasurer Name: BHOLAT, M. IQBAL Address: 525 S. VIRGIL AVE., LOS ANGELES, CA 90020													
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: QUARTERLY FILER													
Form Tpl	Rpt Tp	AI	Recpt Dt	Pgs	Begin Inq#	Reg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans
MS-T			3/23/2009	1	29991785356								
MS-T			4/9/2009	1	29991915009								
F3XN	MY	N	7/28/2009	203	29992513224	1/1/2009	6/30/2009		\$1,014,408	\$528,954	\$800,469	\$742,893	\$0
F3XA	MY	A	1/29/2010	206	10990198362	1/1/2009	6/30/2009		\$1,014,408	\$526,143	\$800,469	\$740,082	\$0
F3XN	YE	N	1/29/2010	142	10990199199	7/1/2009	12/31/2009		\$740,082	\$66,147	\$1,748	\$804,482	\$0
F3XN	Q1	N	4/15/2010	114	10930589130	1/1/2010	3/31/2010		\$804,482	\$358,637	\$762,422	\$400,697	\$0
F3XA	Q1	A	7/15/2010	115	10930980729	1/1/2010	3/31/2010		\$804,482	\$358,043	\$762,422	\$400,103	\$0
F3XN	Q2	N	7/15/2010	92	10930980978	4/1/2010	6/30/2010		\$400,103	\$466,533	\$458	\$866,178	\$0
F3XA	Q2	A	10/15/2010	94	10991379552	4/1/2010	6/30/2010		\$400,103	\$466,533	\$458	\$866,178	\$0
F3XA	Q2	A	1/31/2011	95	11930320152	4/1/2010	6/30/2010		\$400,103	\$466,673	\$538	\$866,237	\$0
F3XN	Q3	N	10/15/2010	130	10991380001	7/1/2010	9/30/2010		\$866,178	\$57,193	\$300,653	\$622,719	\$0
F3XA	Q3	A	1/31/2011	131	11930320288	7/1/2010	9/30/2010		\$866,237	\$57,320	\$300,653	\$622,905	\$0
F3XN	30G	N	12/2/2010	71	10992417327	10/1/2010	11/22/2010		\$622,905	\$28,431	\$620	\$650,716	\$0
F3XA	30G	A	1/31/2011	72	11930320419	10/1/2010	11/22/2010		\$622,905	\$28,431	\$620	\$650,716	\$0
F3XN	YE	N	1/31/2011	38	11930307702	11/23/2010	12/31/2010		\$650,716	\$13,176	\$411	\$663,482	\$0
FIA		A	3/24/2009	5	29933396140								

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Totals						\$1,866,862
Totals					\$1,515,936	

California Real Estate Political Action Committee/Federal (C00083279)

Additional Receipts by Line Number

2011 Mid-Year Report/Amended 2011 Mid-Year Report, received 1/31/12

Report Line	2011 Mid-Year Report (Image 11931531555)	Amended 2011 Mid-Year Report, received 1/31/12 (Image 12950395859)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$153,222.26	\$174,335.33	\$21,113.07
Line 11(a)(ii): Unitemized Contributions from Individuals	\$270,750.53	\$612,861.15	\$342,110.62
		Total Variance:	\$363,223.69

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